

IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF MISSOURI
WESTERN DIVISION

UNITED STATES OF AMERICA,)
vs.)
Plaintiff,)
vs.) Case No. 4:22-CR-00081-SRB-1
SHAUN WALKER,)
Defendant.)

**MOTION FOR CONTINUANCE
WITH SUGGESTIONS**

COMES NOW the defendant, Shaun Walker, by and through his counsel, William Raymond, Assistant Federal Public Defender for the Western District of Missouri, in accordance with Rule 47, Fed. R. Crim. P., and Rule 7.0 (b) and (c) of the Local Rules of Procedure for the United States District Court for the Western District of Missouri, and moves this Court, pursuant to 18 U.S.C. §§ 3161(h)(7)(A) and (B), to remove this case from the Accelerated Joint Criminal Trial Docket scheduled to commence July 18, 2022, and to continue this case until the Accelerated Joint Criminal Trial Docket scheduled to commence on January 9, 2023.

SUGGESTIONS IN SUPPORT OF MOTION FOR CONTINUANCE

1. On March 14, 2022, defendant was charged by criminal complaint with 18 U.S.C. § 2252(a)(2) and 18 U.S.C. § 2252(a)(4).
2. On March 21, 2022, Mr. Walker made his initial appearance on the before the Honorable David P. Rush and the office of the Federal Public Defender was appointed

on the same day.

3. On April 5, 2022, a three-count Indictment was returned by the Grand Jury charging Mr. Walker with violations of 18 U.S.C. § 2252(a)(2) and 18 U.S.C. § 2252(a)(4).

4. On April 13, 2022, Mr. Walker appeared for his Arraignment before the Honorable Lajuana M. Counts and this case was set on the July 18, 2022.

5. Catherine Connelly, Assistant United States Attorney, indicated that she has no objection to the continuance request.

6. Mr. Walker has been consulted and has no objection to the continuance request.

7. Initial discovery has been received. Counsel will need time to thoroughly review the evidence and adequately discuss the case with Mr. Walker. Further investigation is required and defense witnesses must be located and interviewed.

8. The continuance is sought not for purpose of dilatory delay, but is sought in truth and fact that the defendant may be afforded due process of law under the Fifth Amendment to the United States Constitution. In accordance with 18 U.S.C. §§ 3161(h)(7)(A) and (B)(iv), it is submitted that the above-stated reasons for a continuance outweigh the best interests of the public and the defendant to a speedy trial, which is required by 18 U.S.C. § 3161(c)(1).

9. Under the provisions of 18 U.S.C. § 3161(h)(7)(A) the period of time until the next criminal trial docket should be excluded in computing the period of time in which the defendant should be brought to trial under the provisions of the Speedy Trial

Act.

WHEREFORE, Shaun Walker respectfully requests this Court, pursuant to 18 U.S.C. §§ 3161(h)(7)(A) and (B), to remove this case from the Accelerated Joint Criminal Trial Docket scheduled to commence July 18, 2022, and to continue this case until the Accelerated Joint Criminal Trial Docket scheduled to commence on January 23, 2023.

Respectfully submitted,

/s/William J. Raymond
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CERTIFICATE OF SERVICE

In accordance with Rule 49(a), (b) and (d), Fed. R. Crim. P., and Rule 5(b), Fed. R. Civ. P., it is hereby CERTIFIED that one copy of the foregoing motion was electronically filed and a copy emailed to all parties of record this 10th day of June, 2022.

/s/William J. Raymond
William J. Raymond